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April 21, 2011

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Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

**SUBJECT: CITY OF ONTARIO AMENDED COMMENTS ON SCRAP METAL
PERMIT R8-2011-0011 NPDES CAG 618001**

Attention: Mark Smythe

Please find my comments on Scrap Metal Permit below:

- Section II F Typo "industrial stormwater runoffs" should be industrial stormwater runoff
- Section II G Typo "Discharge Prohibitions" should be Discharge Prohibitions
- Section III C Discharge Prohibition "No trash, debris, floating materials, plastics"
Recommend wording change to require Best Available Technology to remove these materials, because it is unreasonable to require that there will be no trash in stormwater. Recommend specifying size of particle requiring treatment and 80% removal.
- Section C 1 f. xii "Build secondary containment and/or roof over chemicals and hazardous materials storage areas." Recommend secondary containment and roof.
- Section III A MRP 4 typo "hosedkeeping practices" should be housekeeping practices
- III B Monitoring Requirements It will be difficult to obtain four qualifying events in California. Recommend requiring two samples per year for small facilities and four samples per year for large facilities.
- III B Table 2 is a very expensive list of constituents to test for small facilities. Also, some of the City's businesses listed in "Attachment A Facilities with General Permit Coverage" do not process or recycle metals and may not have any organics on-site i.e. Foam Zone for example has only Styrofoam on-site, Norm Plastics only recycles plastics on-site. These facilities should be exempt from analyzing for metals and also for

organics that would not be found in their storm water. Foam Zone does conduct hot cutting of foam which may results in some type of organic going into the air, but should only need to test for that organic.

- Section IV Quality Assurance Program- Who has experience with USEPA and SWAMP QAPP requirements? Do you have a list of these professionals/labs? Recommend providing more info on this in the permit.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Y Elliott', with a stylized, cursive script.

Yvonne Elliott
Assistant Engineer

YE:mp